



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-084

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David Lundstrom
Assistant Director, EH&S Environmental Programs
University of Washington
201 Hall Health Center, Box 354400
Seattle, Washington 98195

RE: Self-Implementing PCB Cleanup
UW 203512 Maple Terry Draft PCB Cleanup Verification Sampling Plan

Dear Mr. Lundstrom:

On March 31, 2014, EPA received a letter (Notification) stating that you intend to conduct a self-implementing cleanup and disposal of Polychlorinated Biphenyl (PCB) remediation waste in accordance with the requirements of 40 C.F.R. 761.61(a). The U.S. Environmental Protection Agency (EPA) reviewed the notification and initiated discussions with the University of Washington (University), and its contractor, PBS Engineering + Environmental (PBS) on April 24, 2014. A discussion to clarify site conditions and cleanup plans between EPA and PBS occurred on April 25, 2014. Taking into account clarifications made during that discussion, the EPA has completed our review of the Notification.

The University is in the process of demolishing the Terry Hall building. Previously, a PCB spill from a transformer in the Basement Level Electrical Transformer Room contaminated the concrete and underlying soil. Investigation and remediation took place in the 1990s, but some PCBs remained at concentrations ≤ 25 ppm, which the University plans to remove during demolition activities.

The University proposes a cleanup level of ≤ 1 ppm total PCBs for the 0.033 acre site. This level will be appropriate to ensure no unreasonable risk of injury to health or the environment without institutional or engineering controls.

Site characterization activities identified an area 32.5 feet wide and 31 feet long contaminated with PCBs > 1 ppm in the concrete. Within this footprint, an area 26.5 feet wide by 17 feet long contains soils contaminated with PCBs above 1 ppm. During a discussion with EPA on April 25, 2014, Mr. Mergy of PBS agreed to add an additional 15 foot by 30 foot concrete excavation area on the eastern edge of the proposed remedial footprint. This addition is made a condition of the approval, pursuant to 40 C.F.R. 761.61(a)(3)(i)(D), see Enclosure.

The University proposes to excavate all soil and concrete contaminated with PCBs at as-found concentrations ≥ 1.0 ppm. All material will be disposed of at Chemical Waste Management of the Northwest's Arlington, OR Subtitle C landfill. All disposal actions will be in accordance with 40 CFR 761.61(a)(5)(i)(B).

Confirmation sampling of the excavated areas will follow 40 C.F.R. 761.61(a)(6) and Subpart O as described in the Workplan and Enclosure 1. If confirmation sampling indicates PCBs above the cleanup level, excavation and confirmation sampling will continue until all PCBs ≥ 1 ppm have been removed.

Based on our review, your notification is hereby approved, subject to the following conditions:

1. As stated in 40 C.F.R. 761.61(a), you must conduct the cleanup in accordance with all applicable requirements of 40 C.F.R. 761.61(a)(1) through (9). A copy of those requirements is enclosed for your convenience (Enclosure 1). To assist you in completing the cleanup successfully, we have placed an "X" in the margin to identify specific requirements for which your notice is deficient in describing how you plan to comply. Specific comments about each of the deficient areas are noted in bold italics following the regulatory citation.
2. You must prepare a cleanup completion summary report that describes how you conducted the cleanup in accordance with the applicable regulatory requirements, including those marked with an "X" on Enclosure 1. You must send a copy to me within six months after the date of this letter.
 - a. Enclosed is the ASTM Standard Guide for Greener Cleanups (Guide, Enclosure 2). EPA desires to use sustainable practices at all stages of a cleanup. Please see section 6 of the Guide for the Best Management Practices (BMP) Process. I have highlighted BMP opportunities applicable to this cleanup on the Greener Cleanup BMP Table, Appendix X3 of the Guide. Please review the guide and implement any practices that are feasible. As part of the cleanup completion report, please identify which BMP options were implemented and the qualitative or quantitative environmental footprint reductions. If BMP options are not implemented, please provide a brief description why not.

Please note that this approval does not relieve you from your duty to comply with all other applicable federal, state, and local requirements. In addition, please note that if you wish to make any changes to your notification (including changes in the project schedule), then you must submit your proposal to Michelle Mullin, of my staff, in writing no less than 14 calendar days prior to the proposed implementation of the change. If you have any questions, please contact her by e-mail at mullin.michelle@epa.gov or by telephone at (206) 553-1616.

Sincerely,



Kelly McFadden, Manager
Pesticides and Toxics Unit

Enclosures

1. Regulatory Requirements of 40 C.F.R. 761.61(a)
2. ASTM Standard Guide for Greener Cleanups

cc: John Wallace
University of Washington

Tim Ogden
PBS Engineering and Environmental

Tom Mergy
PBS Engineering and Environmental